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USDOC FOR 532/OEA/LHINES/ADYSON
USDOC FOR 3132 FOR FCS/OIO REGIONAL DIRECTOR WILLIAM ZARIT
BICE FOR OFFICE OF STRATEGIC INVESTIGATIONS

SIPDIS

E.O. 12958: N/A

TAGS: BMGT BEXP HK ETRD ETTC
SUBJECT: EXTRANCHECK: PRE-LICENSE CHECK: HONG KONG COMPETITION
SHOOTING ASSOCIATION
REF: A) USDOC 01884 B) D392696

¶1. Unauthorized disclosure of the information provided below is prohibited by Section 12C of the Export Administration Act.

¶2. As per reftel A request and at the direction of the Office of Enforcement Analysis (OEA) of the USDOC Bureau of Industry and Security (BIS), Export Control Officer Philip Ankel (ECO) conducted a pre-license check at the Hong Kong Competition Shooting Association, Flat A&B, 10/F, Ka Wing Factory Bldg., 19-21 Ng Fong Street, Hong Kong (HKCSA). The purpose of the visit was to determine the suitability of the HKCSA to be a recipient of 36 optical red dot sighting systems that are the subject of export license application D392696. The items (Export Control Classification Number 0A9987) are valued at approximately USD \$6,000 and are controlled for crime control (CC) reasons. The license applicant is C-More Systems of Manassas, Virginia.

¶3. The HKCSA is an air gun shooting group. It is organized in Hong Kong as an association, not as a corporate entity and is registered with the Hong Kong Police Department (standard for associations in Hong Kong). Since its focus is on low power air guns, it does not require separate registration related to conventional guns. More information and pictures of HKCSA's premises can be found at www.hkcsa.com.

¶4. On April 11, 2008, ECO, accompanied by Commercial Assistant, Carrie Chan visited the offices of HKCSA and met with Mr. Ryan Chu, Chairman. He stated that this is HKCSA's third order for these types of products. He stated that HKCSA is an association of sport shooting enthusiasts who meet at the HKCSA's premises and elsewhere for air gun shooting competitions. ECO saw the premises and believes them to be consistent with use for such a purpose.

¶5. As to the particular items in question, Mr. Chu stated that HKCSA will purchase them for resale to members of HKCSA for use during competitions. He stated that HKCSA had likewise sold its previous orders to members. He stated that HKCSA has over 100 members and many of those members own several air guns. He further stated that those members are Hong Kong residents.

¶6. ECO provided Mr. Chu with information about BIS reexport controls and stressed that the items in question may not be reexported to mainland China. Mr. Chu indicated that he understood and that he would review closely the information provide by the ECO.

¶7. At the time visited, the HKCSA appeared to be a suitable recipient of the subject controlled items since it cooperated fully with the PLC and provided information on HKCSA's proposed use of the items in Hong Kong

Cunningham